

ROBERT A. RABBAT (Nevada Bar #12633)
TERI T. PHAM. (California Bar #193383)
Pro Hac Vice forthcoming
ENENSTEIN PHAM GLASS & RABBAT LLP
11920 Southern Highlands Parkway, Suite 103
Las Vegas, Nevada 89141
Telephone: (702) 468-0808
Facsimile: (702) 920-8228
rrabbat@epgrlawyers.com
tpham@epgrlawyers.com
Attorneys for Defendants
Kathy M. Griffin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WHITE ROCKS (BVI) HOLDINGS INC., et al.)	Case No.
)	
Plaintiffs,)	NOTICE OF REMOVAL OF
)	ACTION PURSUANT TO 28 U.S.C.
vs.)	§ 1441(a) (FEDERAL QUESTION)
)	AND § 1441(b) (DIVERSITY)
DAVID REICHMAN, KATHY M. GRIFFIN,)	
FRANK BENINTENDO, DONALD)	
GILBERT, DOES I THROUGH X,)	
INCLUSIVE, and ROE CORPORATIONS I)	
THROUGH X, inclusive,)	
)	
Defendants,)	
)	
)	

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendant Kathy M. Griffin hereby removes to this Court the state court action described below.

1. On or about June 27, 2024, an action was commenced in the Eighth Judicial District Court in and for the County of Clark, State of Nevada, entitled *White Rocks (BVI) Holdings, Inc., et al. vs. David Reichman, et al.*, as case number A-24-896359-B (“Action”). Attached hereto as Exhibit A is a copy of the Verified Complaint filed in this matter.

2. On or about July 2, 2024, Plaintiffs in the Action filed a Verified First Amended Complaint. Attached hereto as Exhibit B is a copy of the Verified First Amended Complaint.

3. Ms. Griffin first received a copy of the Verified First Amended Complaint on July 2, 2024, when it was forwarded by outside corporate counsel for nominal defendant Global Tech Industries Group, Inc. Neither Ms. Griffin nor any defendant have been served with the Summons and Verified First Amended Complaint in the Action.

4. Attached hereto as Exhibits C through G are the following documents, which together with Exhibits A and B constitute all the pleadings filed in the Action:

C. Plaintiffs’ Disclosure Statement

D. Plaintiffs’ Peremptory Challenge of Judge

E. Notice of Department Reassignment

F. Plaintiffs’ Ex Parte Motion to Appoint Receiver and Issue Temporary Restraining Order

G. Appendix To Ex Parte Motion to Appoint Receiver and Issue Temporary Restraining Order

H. Defendants’ Peremptory Challenge of Judge

5. The Action is a civil action of which this Court has original jurisdiction

1 under 28 U.S.C. § 1331, and is one which may be removed to this Court pursuant to the
2 provisions of 28 U.S.C. § 1441(a) in that it arises under and concerns alleged violations
3 of Sections 13 and 15 of the Securities Exchange Act of 1934.

4 6. This Court has supplemental jurisdiction over all other causes of action
5 alleged in the Verified First Amended Complaint pursuant to 28 U.S.C. 1367(a) because
6 all other claims are so related to the above-referenced claim within the original
7 jurisdiction of this Court that they form part of the same case or controversy and arise
8 from the same transaction or occurrence.

9 7. This Action may also be removed to this Court pursuant to the provisions of
10 28 U.S.C. §§ 1332 and 1441(b) in that Plaintiffs and Ms. Griffin are citizens of different
11 states, and the amount in controversy is greater than \$75,000, exclusive of interest and
12 costs. Ms. Griffin is a citizen of the State of Massachusetts, and based on the current
13 allegations of the Verified First Amended Complaint, it does not appear that any Plaintiff
14 is a citizen of Massachusetts.

15 8. There are no other defendants who have been properly joined and served,
16 and no defendant has entered a general appearance. Therefore no additional consent to
17 remove the Action is required.
18

19 Dated: July 7, 2024

ENENSTEIN PHAM GLASS & RABBAT LLP

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21 By: _____


Robert A. Rabbat
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rrabbat@epgrlawyers.com
11920 Southern Highlands Pkwy., Suite 103
Las Vegas, Nevada 89141
Telephone: (702) 468-0808
Facsimile: (702) 920-8228
Attorneys for Defendants,
David Reichman, Kathy M. Griffin, Frank Benintendo,
Donald Gilbert, and Global Tech Industries Group Inc.